

EXHIBIT 4

Greg Looney

HIGHLY CONFIDENTIAL

May 12, 2005

Wilmington, Delaware

1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In Re: PHARMACEUTICAL : MDL DOCKET NO.
: CIVIL ACTION #
INDUSTRY AVERAGE WHOLESALE : 01CV12257-PBS
:
PRICE LITIGATION : HIGHLY CONFIDENTIAL

THIS DOCUMENT RELATES TO:

CERTIFIED COPY

ALL ACTIONS

VOLUME I - Pages 1 to 152

RULE 30(b)(6) deposition of ASTRAZENECA,
by and through its corporate designee, GREG LOONEY,
taken pursuant to notice at the law offices of Morris,
Nichols, Arsht & Tunnell, 1201 North Market Street,
18th Floor, Wilmington, Delaware, beginning at 9:30
a.m., on Thursday, May 12, 2005, before Julie H.
Parrack, Registered Merit Reporter, Certified Realtime
Reporter and Notary Public, there being present:

- - -

Greg Looney

HIGHLY CONFIDENTIAL
Wilmington, Delaware

May 12, 2005

5

1 A. Yes.

2 Q. Can you trace your employment history with its
3 predecessors from the beginning?

4 A. Sure. In 1992 I started with the former
5 Astra/Merck, which was a division of Merck & Company
6 at the time. And I don't know the exact date, but
7 sometime in the late '90s, Astra/Merck became wholly
8 owned by Astra Pharmaceuticals. And then the merger
9 with Zeneca and Astra in 1999 resulted in AstraZeneca,
10 and I was there throughout that entire time period.

11 Q. And what was your position, your first position
12 with Astra/Merck?

13 A. Business Manager.

14 Q. What were your responsibilities?

15 A. I was responsible for managing the finances of
16 the region, doing analytics within the region, and I
17 also was responsible for calling on some key accounts
18 within the region, and negotiating managed care
19 contracts with regional accounts, managed care
20 accounts within the region were the primary
21 responsibilities, among other things.

22 Q. How long were you business manager?

EXHIBIT 5

James F. Liebman

Highly Confidential
Wilmington, DE

February 11, 2005

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS

CERTIFIED COPY

3 In Re: PHARMACEUTICAL

: MDL DOCKET NO.

4 : CIVIL ACTION #

INDUSTRY AVERAGE WHOLESALE

: 01CV12257-PBS

5 :

PRICE LITIGATION

: HIGHLY CONFIDENTIAL

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7 -----
THIS DOCUMENT RELATES TO:

8 ALL ACTIONS
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11 Deposition of JAMES F. LIEBMAN, taken
12 pursuant to notice at the law offices of Morris, Nichols,
13 Arsht & Tunnell, 1201 North Market Street, 18th Floor,
14 Wilmington, Delaware, beginning at 9:30 a.m., on Friday,
15 February 11, 2005, before Julie H. Parrack, Registered Merit
16 Reporter and Notary Public, there being present:

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James F. Liebman

Highly Confidential
Wilmington, DE

February 11, 2005

7

1 BY MS. FEGAN:

2 Q. Good morning, Mr. Liebman.

3 A. Hi, how are you?

4 Q. My name is Beth Fegan. I represent the plaintiffs in
5 this case.

6 Q. Could you tell me where you live?

7 A. I live in St. Louis, Missouri.

8 Q. How long have you lived there?

9 A. Fifty-eight years.

10 Q. Who are you employed by?

11 A. AstraZeneca.

12 Q. How long have you been employed by AstraZeneca?

13 A. Thirty-four years.

14 Q. Could you tell me about your education from college
15 on?

16 A. I have a BS in education. That's from Southeast
17 Missouri, and I then went into the Army for two years, and
18 then joined what was then Stuart Pharmaceuticals.

19 Q. What was your first position at Stuart
20 Pharmaceuticals? And what year was that?

21 A. 1971. I was a sales representative.

22 Q. What were your responsibilities as sales

EXHIBIT 6

Alan J. Milbauer

Highly Confidential
Wilmington, DE

October 27, 2004

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IN THE UNITED STATES DISTRICT COURT

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FOR THE DISTRICT OF MASSACHUSETTS

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In Re: PHARMACEUTICAL : MDL DOCKET NO.

4

: CIVIL ACTION #

INDUSTRY AVERAGE WHOLESALE : 01CV12257-PBS

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PRICE LITIGATION : HIGHLY CONFIDENTIAL

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THIS DOCUMENT RELATES TO:

8

ALL ACTIONS

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COPY

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30(b)(6) Deposition of AZTRAZENECA, taken

12

by and through its corporate designee, ALAN J. MILBAUER,

13

taken pursuant to notice at the law offices of Morris,

14

Nichols, Arsht & Tunnell, 1201 North Market Street, 17th

15

Floor, Wilmington, Delaware, beginning at 10:12 a.m., on

16

Wednesday, October 27, 2004, before Julie H. Parrack,

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Registered Merit Reporter and Notary Public, there being

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present:

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- - -

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Henderson Legal / Spherion
(202) 220-4158

Alan J. Milbauer

Highly Confidential
Wilmington, DE

October 27, 2004

13

1 A. Sorbitrate.

2 Q. Sorbitrate?

3 A. Yeah, S-O-R-B-I-T-R-A-T-E.

4 Q. Is Atlas Chemical Industries still in existence
5 today?

6 A. No.

7 Q. Did it go out of business or was it bought out?

8 A. It was bought.

9 Q. Who bought it?

10 A. ICI.

11 Q. When?

12 A. 1971.

13 Q. And you went to work for ICI?

14 A. Yes. I retained -- I remained working for the
15 company.

16 Q. So I understand, did it become an Atlas Chemical
17 Industries division of ICI or was it merged into ICI?

18 A. It was acquired and I think the name Atlas
19 Chemical went away. My recollection, it may have been --
20 one of the divisions may have still retained like Atlas
21 Powder or something. But it became ICI.

22 Q. Did ICI buy Atlas in its entirety?